

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

Filed By The Court

02/01/25 10:34 p.m.

U.S. BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE:

Jacqueline E. Ard and  
Terry F. Nicola

Debtor(s),

CASE NO. 24-03611-JD  
CHAPTER 13  
HON. L. JEFFERSON DAVIS IV

**DEBTOR'S MOTION FOR ADDITIONAL  
DAMAGES BASED ON CONTEMPT AND  
DEBTORS RESPONSE TO CREDITORS  
OPPOSITION TO DEBTORS' MOTION  
FOR DAMAGES**

PLEASE TAKE NOTICE that the Debtors, Jacqueline E. Ard ("Debtor Ard") and Terry F. Nicola, ("Debtor Nicola") hereby seeks to respond to the Creditors' opposition in response to Debtors' Motion for Damages filed on January 10, 2025. In addition Debtor respectfully moves, pursuant to 11 U.S.C. § 362(a)(6) and 362(k)(1), for an Order for Damages for Contempt and Willful Violation of the Automatic Stay against Julie A. Frankiln, in addition to Matthew Paul, Janet Spinelli, Ralph Paine, John Curtis, Debra Schumann, and Evan Bromley (collectively, the "Creditor(s)"), and to the extent the court determines that the Creditors have committed acts that constitute a willful violation of the automatic stay, award the Debtors cost and expenses and an award of punitive damages as the court deems reasonable under the circumstances, pursuant to §362(k)(1) Debtor Ard respectfully restates the following:

## **JURISDICTION AND THE PARTIES**

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334 (b).
2. This matter is a core proceeding under 28 U.S.C. § 157(b)(1), as matters concerning the administration of the bankruptcy estate are specifically designated as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(A). Under 11 U.S.C. § 105 this court has the inherent power to impose contempt sanctions and issue an order.
3. This matter is a contested matter pursuant to FRBP 9020. This adversary proceeding is one related to the above-captioned bankruptcy case, filed under Chapter 13 of Title 11 now closed in this Court, case number 24-03611-JD. The actions for violating the automatic stay and for contempt are core proceedings under 28 U.S.C. § 157.
4. The creditors mentioned in this motion are the members that comprise the Board of Directors at the Estate of Westbury Owners Association, Inc.: Matthew Paul- President, Janet Spinelli- Vice President, Ralph Paine- Secretary, John Curtis- Treasurer, Debra Schumann- Member-At-Large, and Evan Bromley- Attorney.

## **FACTS**

5. Debtors are U. S. Citizens that reside in South Carolina. Debtor Ard is the owner of record for 100 Kensington Blvd, unit 1106, city of Bluffton, South Carolina, 29910, Beaufort County (“Property”). This property was purchased on March 09, 2021, and is utilized as the Debtors’ secondary home, business office, and as a rental unit.

6. Debtor Ard is the owner of a white 2020 RAM Pro Master 1500 Commercial Van, VIN# 3C6TRVBG8LE103289. This vehicle was purchased on March 30, 2023, and is used as an essential element in the daily operations of the Debtors' business and to transport Debtor Nicola and his mobility equipment who is disabled.
7. Estate at Westbury Owners Association, Inc, is a South Carolina Non-Profit Corporation whose members are the property owners of 320 condominium units (referenced as the "Co-Owners") within the horizontal property regime known as The Estate at Westbury Horizontal Property Regime, Town of Bluffton, Beaufort County, South Carolina. ("EAW")
8. The Property is subject to certain restrictions and affirmative obligations pursuant to the Master Deed ("Master Deed") and By-Laws ("By-Laws") to which the Co-Owner and members of the Board agree to comply with.
9. Estate at Westbury is administered and operated pursuant to the covenants, conditions and restrictions set forth in its Master Deed and By-laws by a Council of Co-owners referred to as the Board of Directors ("Board")
10. Section 7.1 of the Master Deed of The Estate At Westbury states:

**THE ASSOCIATION; BOARD OF DIRECTORS**

In order to provide for the effective administration of the Regime by the Unit Owners, Estate at Westbury Owners Association, Inc, a South Carolina not-for-profit corporation (the "Association") has been formed. The Association shall operate and manage the Regime and undertake and perform all acts and duties incident thereto in accordance with the provisions of this Master Deed and Bylaws of the Association, and the Rules and Regulations promulgated by the Association from time to time. The Board of Directors of the Association shall have authority to take all actions on behalf of the Association that do not require, by law, the Master Deed, or the ByLaws, a vote of by Owners, and the decision of the Board of Directors shall be binding upon the Association and the Owners.



11. Section 7.1 of the Master Deed of The Estate At Westbury states:

The Declarant, Board of Directors, officers of the Association, and such employees of the Association and/or the Management Agent as the Board of Directors shall specify by written resolution from time-to-time (cumulatively, "Non-Liable Person"), shall not be liable to the Owners or the Association for any mistake in judgment or acts or omissions unless such act or omission was made in bad faith or was the result of gross negligence or fraud by such Person. The Association shall indemnify and hold harmless such Non-Liable Persons against all liabilities to others arising out of any agreement made by such Non-Liable Persons on behalf of the Association unless such agreement was made in bad faith, was the result of gross negligence or fraud by such Non-Liable Person, or was in clear violation of a contractual obligation of such Non-Liable Person to the Association. (SEE EXHIBIT A)

**PROCEDURAL BACKGROUND**

1. The Debtors filed the above-referenced Chapter 13 case on October 4, 2024 @ 2:53 PM. (SEE EX "A" ECF Doc No.1)
2. On October 4, 2024, the Debtors filed a Credit Matrix listing the Creditors as interested parties to the filing (See page 1, second entry, listing Creditors attorney of record) (SEE EX "A" ECF Doc No.8)
3. Immediately after filing, on October 6, 2024, the Notice of Bankruptcy was delivered by first-class mail to each creditor on the Creditor Matrix by the Bankruptcy Noticing Center (SEE EX "A" ECF Doc No.11) -**FIRST**

**NOTIFICATION OF FILING**

4. On October 4, 2024 @ 5:01PM Debtors emailed a Bankruptcy Notification directly to Evan Bromley (Attorney of record for the Creditor) and copied his assistant, Nhi Nguyen with a warning: AUTOMATIC STAY CEASE ALL ADVERSE ACTIONS in the subject line with the attachment of the Notice of Bankruptcy Filing. (SEE EX "B")

**-SECOND NOTIFICATION OF FILING**

5. On October 3, 2024 @ 3:37PM a Notice of Hearing was filed with Beaufort Co Common Pleas (C/A No. 2024CP0701407), naming the Estate at Westbury as the Plaintiff and the Debtors as the Defendants. The filing disclosed that the ONLY counsel of record for the Association was Evan Bromley. The hearing was scheduled to be heard on October 16, 2024 @ 1:30PM (SEE EX "C")
6. On October 7, 2024 @ 3:19 PM, Evan Bromley emailed acknowledgement that he had received the Notice of Bankruptcy filing and had informed the special referee to remove the foreclosure proceeding from the hearing calendar. (SEE EX "D") - **CONFIRMATION THAT EVAN BROMLEY, COUNSEL FOR ESTATE AT WESTBURY WAS AWARE OF THE FILING.** The Filing had to be communicated to the Board in order to indefinitely cancel the upcoming proceedings. -**THIRD NOTIFICATION OF FILING**
7. On October 8, 2024, at 5:56 AM Debtors received a broadcast email that had been distributed to all 320 Co-Owners of the Estate At Westbury. The email disclosed private financial information to all owners in the Association. In the email the Board members stated that "per our attorney, revoking the parking decals associated with the foreclosure of Ard 1106 All board members are in agreement..." They also stated that "All 5 board members have unanimously agreed to revoke the parking decals associated with unit 1106." (SEE EX "E") - **Willful violation of the Automatic Stay in which ALL 5 Board Members agreed to.**

8. On October 10, 2024, at 6:00 PM, during the monthly board meeting, the Board of Directors again circulated the meeting agenda to 320 members of the Association disclosing the Debtors' private financial affairs. One of the main topics of the meeting was the delinquency of the Debtors account. The Board informed the members that they had foreclosed on the Debtors unit (character damaging and false statement) resulting in the Debtors' account and access to their home being deactivated. The Board continued to state that they had spoken to their attorney who had advised them that it was ok for them to proceed with revoking the Debtors' parking decals, deactivating the Debtors' account, and towing any of the Debtors' registered vehicles off the premises. The Board stated that the decision to take that action was a unanimous decision by the Board members. After conducting the meeting, the Board instructed Palmetto Towing to remove Debtor Ard's RAM ProMaster van off the premises. **-Second Willful**

**Violation of the Automatic Stay**

9. On November 11, 2024 @ 11:27 AM, after multiple attempts to contact the board directly were unsuccessful, Debtor Ard sent an email to each Board Member notifying them that they were in violation of the Automatic Stay. Debtor Ard outlined how their actions were a blatant disregard to the Court's order to Stay. The Debtor further expressed that their unconstitutional behavior was imposing an extreme hardship on Debtor Nicola who is physically disabled and incapacitated and was in desperate need of his disability aids, the use of the vehicle, and access



to the home for safe transporting. The Debtors gave them 24-hours to correct the violation. (SEE EX “F”). **-Third Willful Violation of the Automatic Stay.** The Board Members COMPLETELY DISREGARDED THE DEBTOR’S REQUEST and made no effort to correct the infraction by the deadline date. **-FOURTH NOTIFICATION OF FILING**

### LEGAL STANDARDS

1. The commencement of a Voluntary Chapter 13 constitutes an order for relief, pursuant to 11 U.S.C. § 301.
2. 11 U.S.C. § 362(a) states that a petition filed under 11 U.S.C. § 301 operates as a stay, applicable to all entities, of any “ continuation, including the issuance or employment of Process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose from the commencement of the case under this title” or “ any act to obtain possession of property of the estate or to exercise control over property of the estate”.
3. 11 U.S.C. § 362 imposes an affirmative duty upon creditors to stop all actions and release any property received post-petition upon learning of the bankruptcy filing. *See, e.g., In re Manuel*, No.14-53487, 2014 WL 7405471, at \*2, 2014 Bankr. LEXIS 5177, at \*6 (Bankr.E.D.Mich. Dec.24, 2014); *see also In re Forkner*, No. 10-01585, 2010 WL 5462543, at \*2, 2010 Bankr. LEXIS 4595, at \*5(Bankr. N.D. Iowa Dec 22, 2010); *Spanger v. Latham, Stall, Wagner, Steel & Lehman, P.C.*, No. CIV-04-508-L, 2005 WL 1950364, at \*1, 2005 U.S. Dist. LEXIS 46883, at

\*2(W.D.Okla. Aug.15, 2005).

4. Section 362(h) provides an enforcement mechanism to protect a debtor from creditors who “willfully” violate the automatic stay. E.g. *In re Solis*, 137 B.R. 121, 129 (Bankr. S.D.N.Y. 1992) Subsection (h) provides that:

An individual injured by any willful violation of a stay provided by this section shall recover actual damages, including cost and attorneys’ fees, and, in appropriate circumstances, punitive damages.

5. A willful violation does not require “specific intent” to violate the automatic stay; nor will a “good faith” belief that an action was not violative of section 362 preclude a finding that the action was, in fact, a “willful” violation. Rather, the test is usually characterized in terms of whether a creditor took some collection action despite its knowledge that the debtor had filed a bankruptcy petition. A “willful” violation of the automatic stay occurs when the creditor acts deliberately with knowledge of the bankruptcy petition.” *Knaus v. Concordia Lumber Co., Inc (In re Knaus)*, 889 F.2d 773,775 (8<sup>th</sup> Cir. 1989).
6. In addition, an action is “willful” under §362(k) when a party has knowledge of the bankruptcy proceedings, as the parties are charged with having knowledge of the automatic stay. *In re Dyer*, 322 F.3d 1178, 1191 (9<sup>th</sup> Cir. 2003)
7. Violations of the automatic stay are actionable against not only the client, but the attorney for that client that willfully violates the automatic stay on behalf of that client. *In re LeGrand*, 612 B.R. 604, 612 (Bankr. E.D. Cal. 2020) (citing *Pioneer Inv. Servs. Co. v Brunswick*



Assocs. Ltd. P'ship, 507 U.S. 380, 396-97 (1993); Link v. Wasbash R. Co., 370 U.S. 626, 633-34 (1962); Smith v Ayer, 101 U.S. 320, 325-26 (1879)).

### **GROUND TO HOLD DEBTORS IN CONTEMPT**

8. Each individual board member was made aware of the bankruptcy petition when (1) they received the Notice of Bankruptcy filing on Oct 4 by email; when (2) they received Notification by First Class mail through the Bankruptcy court, when (3) they spoke with their attorney who had canceled their pending lawsuit and removed the court date of October 16<sup>th</sup> from their calendar, when (4) The Debtors sent an email on November 11, 2024, pleading for them to comply with the Stay order. Each individual member has shown a blatant disregard for the Bankruptcy court and the Rule of Law which constitutes a deliberate intention to act in “bad faith.”
9. As an owner and Co-Owner of the Estate at Westbury Owners Association, Inc, the Debtors are given the right to park on the premises. That right is not subject to whether the owners account is in good standing or delinquent. The office requests that each owner register their vehicles and receive a parking pass so that they are aware of what vehicles have right of access. On October 6, 2023, I registered my RAM ProMaster with the Administration Office and received a parking decal. At the time my vehicle was illegally removed from the premises, it was parked properly in a parking space in front of my unit, with the parking decal visible on the front windshield. (SEE EX “G”)
10. The Estate at Westbury’s Board of Directors have at their disposal legal representation with years of experience and knowledge of the law. Evan Bromley, their counsel of

record, has practiced law for 17 years in South Carolina. Julie Franklin, the Creditors alleged counsel of record, has practiced law for 13 years with extensive knowledge of the South Carolina laws for the past 3 years.

11. Julie Franklin alleges that she was the counsel of record for the Estate At Westbury when the case was filed on October 4, 2024, and that she did not receive notice of the proceeding, therefore her clients (The Board Members of the Estate of Westbury) were not properly notified. There is NO EVIDENCE of Ms. Franklin's appointment as counsel of record on ANY proceedings before the date of November 14, 2024, which was the day she emailed Debtor Ard, and simultaneously, filed a "Notice of Change of Registered Agent" on that same day, November 14, 2024, to the South Carolina Secretary of State (SEE EX "H")
12. Julie Franklin's deceptive attempt to collude with the Defendants in an effort to evade liability is a violation of the Rules of Professional Conduct at which she is bound, and for that Ms. Franklin should be held in Contempt of Court.
13. What is clear is that (1) Julie Franklin WAS NOT the counsel of record for Estate at Westbury on October 4, 2024, when the Chapter 13 case was filed, therefore the lack of notification to her office does not support a claim of improper notice; (2) what is clear is the Creditor was properly notified in 4 separate occasions of the Bankruptcy filing; (3) what is clear is that after notification, the Creditors continued with their harassing collection efforts, failed to comply with the order, and took actions to impose further harm, despite being notified to cease all actions. These actions constitute acts of "Bad

Faith” and therefore, negate the protections of the Business Rule Defense.

14. The Board Members of the Estate At Westbury willfully violated the Automatic Stay.

In the event that this court finds that the Estate At Westbury is at fault and demands an award, judgement should be satisfied from the individual Board Members and their counsel who acted in “bad faith”, and not the Co-Owners of the Estate At Westbury through the reserved account of the Associations collected dues.

15. The named Board Members and their counsel deliberately acted in “Bad Faith” with the intention to cause harm. Julie Franklin should be held in contempt and held liable for attempting to cover up the unlawful acts of the Board Members. The Board members had knowledge of the bankruptcy and was aware of the harm they would impose.

16. One of the most VITAL parts of a successful reorganization rests on the provisions of the Automatic Stay. This intricate part of the bankruptcy process is designed to preserve the debtor’s estate, to protect the interest of the debtor and the creditor, and lastly, to allow the debtor the opportunity to “take a breather” and reorganize their financial affairs for a successful transition into the bankruptcy process.

17. An act of good faith by the board members would have been to seek the immediate advice of their legal team before proceeding with any actions against the Debtor and if in fact that is the course that was taken, then the liability must fall on Evan Bromley and Julie Franklin for their involvement in the creditors’ deliberate and willful violation of the Automatic Stay.



18. The scope of the automatic stay encompasses more than property of the estate, it prohibits the continuation of actions or proceedings against property of the estate or against the Debtor. *In re Manual Case*, 14-53487 (Bankr.E.D. Mich. Dec 24,2014)
19. The creditors blocked all access to the debtor's property, they unlawfully towed the debtor's vehicle off the premise, and they refused to return the vehicle after being notified of the deadline to cure. All these are willful acts that violate the Automatic Stay.
20. After acquiring actual knowledge of the debtor's bankruptcy filing the creditors failed to take steps to undo or correct their wrongful actions.
21. The Creditor(s) willful and intentional actions caused significant physical, financial, and emotional harm to the Debtors. Debtor Ard spoke directly with the President, Matthew Paul and Vice President, Janet Spinelli and expressed the financial and physical hardship the Debtors would face if (1) their account was deactivated, (2) they were locked out of their home, and (3) their vehicle was confiscated. Despite the knowledge that these actions would be unlawful and cause extreme harm, the Board members proceeded to inflict harm on the debtors anyway.
22. The egregious acts of the Creditors have completely deprived the Debtors of their right to reorganize successfully. As a result, the Debtors housing expenses have doubled, they have loss 80% of their business revenue, and they have experienced a total loss of enjoyment of life.
23. The Creditors inflicted an insurmountable amount of harassment and shame on the

Debtors. The overwhelming amount of anxiety and distress prevented them from accessing their home. The fear that if they attempted to access their home, they would publicly be embarrassed, locked out, and left abandoned without any means of transportation. They were left with no valid parking pass, no valid key code to enter the gate of the property, therefore, they were forced to abandon their home and seek refuge out-of-state with family members. This emergency housing arrangement made it impossible for the Debtors to gain access to their home and retrieve the valuable documents they needed to proceed with the filing of their bankruptcy.

24. Board members are bound by their fiduciary duties to act in "good faith" which is in the best interests of their members, and to do no harm. I made multiple requests to compel compliance of the Automatic Stay. Each individual member willfully neglected to correct the violations and disregarded their duty to serve in good faith.
25. What is clear...is that the Board Members and their counsel have made it common practice to disregard the Laws of South Carolina and the United States Constitution without fear of any legal ramifications. Their egregious acts have not only violated the Bankruptcy Code but were also a direct violation of the Fourteenth Amendment - property rights; 18 USC 1512(b); FDCPA 15 USC §805 (b) Communication with third parties; 15 USC §806 Harassment or Abuse; 15 USC §808 Unfair Practices; The Dodd-Frank Act under the UDAAP; and the American with Disabilities Act.
26. The Creditors' willful disregard for the bankruptcy law has allowed the Creditor to weaponize the bankruptcy process and use it to take advantage of the Debtors in their

most vulnerable state, which totally collapsed their financial stability.

27. I pray that this Honorable Court would set an example and the standard that compliance of the Bankruptcy Code is mandatory, and that a willful disregard of the law will not be tolerated at any level in the United States Bankruptcy Court For The District of South Carolina.

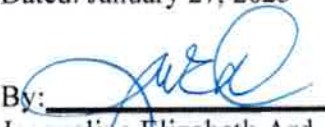
The Debtors respectfully request that this Honorable court issue a judgment against each individual creditor for willfully violating the automatic stay pursuant to 11 USC 362(b).

Debtors request this court:

- a. Award the debtor actual damages for losses incurred.
- b. Award the debtor, legal fees and cost to bring this adversary proceeding.
- c. Award the debtor punitive damages for their deliberate disregard of the law
- d. And grant any such other and further relief as the court deems just and proper.

WHEREFORE, the Debtors respectfully request that the Court enter an Order, granting the relief requested herein and providing such other and further relief as the Court deems just and proper.

Dated: January 27, 2025

By:   
Jacqueline Elizabeth Ard, *pro se*  
239 Beach City Rd #3218  
Hilton Head, SC 29926  
Email: jacquelineard72@gmail.com

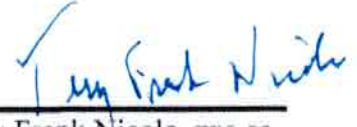
By:   
Terry Frank Nicola, *pro se*  
663 Wm Hilton Pkwy #4408  
Hilton Head, SC 29928  
Terry Nicola5821@yahoo.com



EXHIBIT LIST

Case: 24-03611-JD Court: US Bankruptcy Court Judge: L. JEFFERSON DAVIS IV  
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE: JACQUELINE E. ARD  
TERRY F. NICOLA

DEBTORS MOTION FOR ADDITIONAL  
DAMAGES BASED ON CONTEMPT  
AND DEBTORS RESPONSE TO CREDITORS  
OPPOSITION TO DEBTORS'  
MOTION FOR DAMAGES

Introducing Party: DEBTOR 1: JACQUELINE ARD

DATE ID	ID#	EXHIBIT DESCRIPTION	DATE ADMITTED	EXH. #	A/R
		EXCERPT OF (PG 11) EAW MASTER DEED	2/1/25	A	
		VOLUNTARY PETITION FILED	1/27/25	A	
		PAGE 1 - CREDITOR LIST FILED	1/27/25	A	
		NOTICE OF CHPT 13 - SERVED ON CREDITORS	1/27/25	A	
		EMAILED NOTICE OF FILING TO CREDITOR	1/27/25	B	
		COPY OF THE NOTICE OF HEARING OF CIVIL ACTION	1/27/25	C	
		EMAILED ACKNOWLEDGEMENT OF NOTICE OF BK FILING	1/27/25	D	
		EMAILED MEETING AGENDA FROM BOD	1/27/25	E	
		EMAIL SENT TO BOD TO RETURN VEHICLE	1/27/25	F	
		PICTURES OF VAN PARKED PROPERLY DISPLAYING DECAL	1/27/25	G	
		11/14/24 JULIE FRANKLIN APPOINTMENT AS AGENT	1/27/25	H	
		11/14/24 JULIE FRANKLIN EMAIL TO DEBTOR	2/1/25	H	

A = ADDRESSED / R = RETURNED

Receiving Clerk: \_\_\_\_\_ Date: \_\_\_\_\_  
Evidence Clerk: \_\_\_\_\_ Date: \_\_\_\_\_  
Exhibits Returned to admitting Party: \_\_\_\_\_ Date: \_\_\_\_\_

# **Exhibit A**

Garage Unit for the maintenance and repair of such encroachments.

Encroachments referred to this Section include, but are not limited to, encroachments caused by error, omission or variance from the original plans in the construction of the Common Elements, Garage Common Elements or any Unit or Garage Unit constructed; by error in the Plans or this Master Deed; by settling, rising, or shifting of the earth; or by changes in position caused by repair or reconstruction of any part of the Common Elements, Garage Common Elements or any Unit or Garage Unit in substantial conformity to the Plans.

#### **5.5. PRIOR RECORDED EASEMENTS**

The Property shall be subject to any easements shown on any prior recorded plat of the Property or shown or defined in this Master Deed.

#### **5.6. GOVERNMENTAL EASEMENT**

Police, fire, water, health and other authorized governmental officials, employees and vehicles shall have the right of ingress and egress to the Property, and any portion thereof, for the performance of their official duties, to the extent permitted by applicable law and any Rules and Regulations not contrary to applicable law that are adopted by the Board of Directors.

### **6. PERCENTAGE INTERESTS.**

The Percentage Interest of Units is shown in Exhibit D. The Percentage Interest for Garage Units is shown in Exhibit D-1.

### **7. ASSOCIATION; ADMINISTRATION; VOTING; RECORDS.**

#### **7.1. THE ASSOCIATION; BOARD OF DIRECTORS**

In order to provide for the effective administration of the Regime by the Unit Owners, Estate at Westbury Owners Association, Inc., a South Carolina not-for-profit corporation (the "Association") has been formed. The Association shall operate and manage the Regime and undertake and perform all acts and duties incident thereto in accordance with the provisions of this Master Deed and Bylaws of the Association, and the Rules and Regulations promulgated by the Association from time to time. The Board of Directors of the Association shall have authority to take all actions on behalf of the Association that do not require, by law, this Master Deed, or the Bylaws, a vote of by Owners, and the decision of the Board of Directors shall be binding upon the Association and the Owners. A copy of the initial Bylaws is annexed hereto and made a part hereof as Exhibit B.

#### **7.2. MEMBERSHIP**

The Owner of each Unit shall automatically be a member of the Association upon acquiring an ownership interest in a Unit. Membership in the Association shall be appurtenant to and not separable from ownership of a Unit. The membership of an Owner shall terminate automatically upon conveyance of title to the Unit previously owned by such Owner, regardless of the means by which such conveyance of title occurs. No Person holding any lien, mortgage or other encumbrance upon any Unit or Garage Unit shall be entitled solely by virtue of such lien, mortgage or other encumbrance to membership in the Association or to any of the rights or privileges of such membership. In the administration of the operation and management of the Regime, the Association shall have authority and power to enforce the provisions of this Master Deed, levy and collect Assessments in the manner hereinafter provided, and adopt, promulgate and enforce such rules and regulation governing the use of the Units, Common Elements, Garage Common Elements and Limited Common Elements as the Association may deem to be in the best interest of the Regime.

#### **7.3. VOTING**

The Owner of a Unit shall have the right to cast the number of votes attributable to the Percentage Interest of such Unit. Votes may be cast in person or by written proxy at all meetings of the Association. The holder of a proxy need not be an Owner. Unless a different number, and not less than a Majority in Interest, is specified in this Master Deed or in the Bylaws, all actions requiring a vote of the Owners shall require approval of a Majority in Interest. Cumulative voting is prohibited. Further details regarding voting shall be set forth in the Bylaws.



Fill in this information to identify your case:

United States Bankruptcy Court for the:

\_\_\_\_\_ District of \_\_\_\_\_

Case number (if known): \_\_\_\_\_

Chapter you are filing under:

- ☐ Chapter 7  
☐ Chapter 11  
☐ Chapter 12  
☒ Chapter 13

FILED  
at 12 O'clock & 29 min. P M

OCT 04 2024

United States Bankruptcy Court  
Columbia, South Carolina

☐ Check if this is an  
amended filing

## Official Form 101

# Voluntary Petition for Individuals Filing for Bankruptcy

06/24

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint case*—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, "Do you own a car," the answer would be *yes* if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

### Part 1: Identify Yourself

#### 1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

#### About Debtor 1:

JACQUELINE

First name

ELIZABETH

Middle name

ARD

Last name

Suffix (Sr., Jr., II, III)

#### About Debtor 2 (Spouse Only in a Joint Case):

TERRY

First name

FRANK

Middle name

NICOLA

Last name

Suffix (Sr., Jr., II, III)

#### 2. All other names you have used in the last 8 years

Include your married or maiden names and any assumed, trade names and *doing business as* names.

Do NOT list the name of any separate legal entity such as a corporation, partnership, or LLC that is not filing this petition.

First name

Middle name

Last name

First name

Middle name

Last name

Business name (if applicable)

Business name (if applicable)

First name

Middle name

Last name

First name

Middle name

Last name

Business name (if applicable)

Business name (if applicable)

#### 3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

XXX - XX - 3748

OR

9 XX - XX -

XXX - XX - 8286

OR

9 XX - XX -

List of Creditors

**FILED**  
at 12 O'clock & 29 min. P.M.  
OCT 04 2024

United States Bankruptcy Court  
Columbia, South Carolina

Hon. Marvin H. Dukes, III  
Beaufort County Master In Equity  
102 Ribaut Road, 2nd Floor  
Beaufort, SC 29902

Bromley Law Firm LLC  
211 Goethe Road, Suite B  
P.O. Box 570 (Mail)  
Bluffton, South Carolina 29910

The Spa at Port Royal Sound  
c/o IMC Resort Services, Inc., AAMC  
239 Beach City Road  
Hilton Head Island, SC 29928

Taybron Law Firm, LLC  
3399 Churchview Ave  
Pittsburgh, PA 15227

Honorable Nicola Henry-Taylor  
Alleghany Court of Common Pleas  
712 City-County Building  
414 Grant Street Pittsburgh, PA 15219

George B. Smythe (S.C. Bar No. 103025)  
4000 S Faber Place Drive, Suite 300  
Charleston, SC 29405

Scott M. Wild  
Attorney for the Plaintiff  
P.O. Box 6867  
Hilton Head Island, SC 29938

Jannine M. Mutterer, Esq.  
P.O. Box 29  
Bluffton, SC 29910

<b>Information to identify the case:</b>		
Debtor 1	<b>Jacqueline Elizabeth Ard</b>	Last 4 digits of Social Security number or ITIN <b>xxx-xx-3748</b>
	First Name Middle Name Last Name	EIN <b>61-1604111, 45-4003120</b>
Debtor 2	<b>Terry Frank Nicola</b>	Last 4 digits of Social Security number or ITIN <b>xxx-xx-8286</b>
(Spouse, if filing)	First Name Middle Name Last Name	EIN <b>88-1009431</b>
United States Bankruptcy Court	<b>District of South Carolina</b>	Date case filed for chapter <b>13 10/4/24</b>
Case number:	<b>24-03611-eg</b>	

**Official Form 309I**

**Notice of Chapter 13 Bankruptcy Case**

10/20

For the debtors listed above, a case has been filed under chapter 13 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors, the debtors' property, and certain codebtors. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

Confirmation of a chapter 13 plan may result in a discharge. Creditors who assert that the debtors are not entitled to a discharge under 11 U.S.C. § 1328(f) must file a motion objecting to discharge in the bankruptcy clerk's office within the deadline specified in this notice. Creditors who want to have their debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office by the same deadline. (See line 13 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	Jacqueline Elizabeth Ard	Terry Frank Nicola
2. All other names used in the last 8 years		
3. Address	239 Beach City Rd Unit 3218 Hilton Head, SC 29926	663 William Hilton Pky Unit 4408 Hilton Head, SC 29928
4. Debtor's attorney Name and address	None	
5. Bankruptcy trustee Name and address	James M. Wyman PO Box 997 Mount Pleasant, SC 29465-0997	Contact phone (843) 388-9844 Email <a href="mailto:13info@charleston13.com">13info@charleston13.com</a>
6. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at <a href="https://pacer.uscourts.gov">https://pacer.uscourts.gov</a>	J. Bratton Davis United States Bankruptcy Courthouse 1100 Laurel Street Columbia, SC 29201-2423	Hours open 8:30 am – 4:30 pm Contact phone 803-765-5436 Date: 10/4/24
7. Meeting of creditors Debtors must attend the meeting to be questioned under oath. In a joint case, both spouses must attend. Creditors may attend, but are not required to do so.	<b>December 2, 2024 at 09:30 AM</b> The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Location: Zoom video meeting. Go to <a href="https://zoom.us/join">Zoom.us/join</a> . Enter Meeting ID and Passcode or call telephone number listed below: Meeting ID: 320 853 8018, Passcode: 2272208201, Telephone: 1-854-228-6680  For additional meeting information go to <a href="https://www.uscourts.gov/ust/moc">https://www.uscourts.gov/ust/moc</a>

For more information, see page 2



Debtor **Jacqueline Elizabeth Ard and Terry Frank Nicola**

Case number **24-03611-eg**

<b>8. Deadlines</b> The bankruptcy clerk's office must receive these documents and any required filing fee by the following deadlines.	<p><b>Deadline to file a complaint to challenge dischargeability of certain debts: You must file:</b> <span style="float: right;"><b>Filing deadline:</b> 1/31/25</span></p> <ul style="list-style-type: none"> <li>a motion if you assert that the debtors are not entitled to receive a discharge under 11 U.S.C. § 1328(f) or</li> <li>a complaint if you want to have a particular debt excepted from discharge under 11 U.S.C. § 523(a)(2) or (4).</li> </ul> <p><b>Deadline for all creditors to file a proof of claim (except governmental units):</b> <span style="float: right;"><b>Filing deadline:</b> 12/13/24</span></p> <p><b>Deadline for governmental units to file a proof of claim:</b> <span style="float: right;"><b>Filing deadline:</b> 4/2/25</span></p>
<p><b>Deadlines for filing proof of claim:</b></p> <p>A Proof of Claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at <a href="http://www.uscourts.gov">www.uscourts.gov</a> or any bankruptcy clerk's office. If you do not file a proof of claim by the deadline, you might not be paid on your claim. To be paid, you must file a proof of claim even if your claim is listed in the schedules that the debtor filed.</p> <p>Secured creditors retain rights in their collateral regardless of whether that creditor files a Proof of Claim.</p> <p>Filing a proof of claim submits the creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p> <p>You may electronically file claims at <a href="http://www.scb.uscourts.gov/electronic-filing-claims">http://www.scb.uscourts.gov/electronic-filing-claims</a>.</p>	
<p><b>Deadline to object to exemptions:</b> <span style="float: right;"><b>Filing deadline:</b> 30 days after the conclusion of the meeting of creditors</span></p> <p>The law permits debtors to keep certain property as exempt. If you believe that the law does not authorize an exemption claimed, you may file an objection.</p>	
<b>9. Hearing on Confirmation</b>	<p>The confirmation hearing will be held on: <b>1/15/25 at 10:00 AM</b>. Location: <b>King and Queen Building, 145 King Street, Room 225, Charleston, SC 29401</b>. A copy of the plan will be sent separately by the debtor. This hearing may be continued or rescheduled as necessary and due notice will be given.</p> <p>Any objection to confirmation of the chapter 13 plan must be filed and served at least seven days prior to the confirmation hearing. Objections to the confirmation may be overruled if the objecting creditor fails to appear and prosecute the objection. If no objection is timely filed, the plan may be confirmed on recommendation of the trustee. The debtor(s) is/are required to appear at the confirmation hearing unless excused by order of the Court or Chambers Guidelines.</p>
<b>10. Creditors with a foreign address</b>	<p>If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadline in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>
<b>11. Filing a chapter 13 bankruptcy case</b>	<p>Chapter 13 allows an individual with regular income and debts below a specified amount to adjust debts according to a plan. A plan is not effective unless the court confirms it. You may object to confirmation of the plan and appear at the confirmation hearing. A copy of the plan will be sent to you later and the confirmation hearing will be held on the date shown in line 9 of this notice. The debtor will remain in possession of the property and may continue to operate the business, if any, unless the court orders otherwise.</p>
<b>12. Exempt property</b>	<p>The law allows debtors to keep certain property as exempt. Fully exempt property will not be sold and distributed to creditors, even if the case is converted to chapter 7. Debtors must file a list of property claimed as exempt. You may inspect that list at the bankruptcy clerk's office or online at <a href="https://pacer.uscourts.gov">https://pacer.uscourts.gov</a>. If you believe that the law does not authorize an exemption that debtors claimed, you may file an objection by the deadline.</p>
<b>13. Discharge of debts</b>	<p>Confirmation of a chapter 13 plan may result in a discharge of debts, which may include all or part of a debt. However, unless the court orders otherwise, the debts will not be discharged until all payments under the plan are made. A discharge means that creditors may never try to collect the debt from the debtors personally except as provided in the plan. If you want to have a particular debt excepted from discharge under 11 U.S.C. § 523(a)(2) or (4), you must file a complaint and pay the filing fee in the bankruptcy clerk's office by the deadline. If you believe that the debtors are not entitled to a discharge of any of their debts under 11 U.S.C. § 1328(f), you must file a motion by the deadline. The bankruptcy clerk's office must receive the objection by the deadline to object to exemptions in line 8.</p>
<b>14. Dismissal Notice</b>	<p>This case may be converted or dismissed at the confirmation hearing for a failure to: file a confirmable chapter 13 plan, pay the applicable filing fee, file or provide documents, attend the meeting of creditors, or timely make payments due under a chapter 13 plan as required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, or the applicable judge's Chambers Guidelines.</p>
<b>15. Miscellaneous Notice</b>	<p>The Voice Case Information System (VCIS) will give status information on cases filed or converted after 11/30/88. Call 1-866-222-8029. Please refer to the Court's website at <a href="http://www.scb.uscourts.gov">www.scb.uscourts.gov</a> for further information.</p>
<b>16. Options to Receive Notices Served by the Clerk by Email Instead of by U.S. Mail</b>	<p>(1) Anyone can register for the Electronic Bankruptcy Noticing program at <a href="http://bankruptcyntices.uscourts.gov">bankruptcyntices.uscourts.gov</a> OR (2) Debtors can register for electronic notice by filing local form 'Debtor's Electronic Noticing Request (DeBN)' with the Clerk of Court. Both options are FREE and allow the clerk to quickly send you court-issued notices and orders by email. See Local Rule 9036-1.</p>

## Certificate of Notice Page 3 of 6

United States Bankruptcy Court

District of South Carolina

In re:

Jacqueline Elizabeth Ard

Terry Frank Nicola

Debtors

Case No. 24-03611-eg

Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0420-2

User: admin

Page 1 of 4

Date Rcvd: Oct 04, 2024

Form ID: b309i

Total Noticed: 105

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
++	Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. § 342(f) Fed. R. Bank. P. 2002(g)(4).
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 06, 2024:

Recip ID	Recipient Name and Address
db	+ Jacqueline Elizabeth Ard, 239 Beach City Rd, Unit 3218, Hilton Head, SC 29926-4718
jdb	+ Terry Frank Nicola, 663 William Hilton Pky, Unit 4408, Hilton Head, SC 29928-3537
544438555	++ ALLSTATE INSURANCE, PO BOX 21169, ROANOKE VA 24018-0537 address filed with court, ALLSTATE, 1819 ELECTRIC RD, ROANOKE, VA 24018
544438548	+ AMERICAN EXPRESS GLOBAL C, 261 OLD YORK ROAD SUITE 832, JENKINTOWN, PA 19046-3713
544438519	American Express, 19640 N 31st St. Ave, Phoenix, AZ 85027
544438512	+ Arlene Grisby, 21215 Dartmouth, Southfield, MI 48076-5634
544438544	+ Armstrong Cable, PO Box 3001, Lancaster, Pennsylvania 17604-3001
544438511	+ Braun Kendrick Finkbeiner PLC, 4301 Fashion Square Blvd, Saginaw, MI 48603-5218
544438576	+ Bromley Law Firm LLC, 211 Goethe Road, Suite B, PO Box 570 (Mail), Bluffton, SC 29910-0570
544438584	+ CAPITAL ONEAUTO FINANCE, 7933 PRESTON RD, PLANO TX 75024-2302
544438527	+ COMENITY PORTFOLIO REFRESH, 3095 LOYALTY CIRCLE, COLUMBUS, OH 43219-3673
544438524	+ Capone-Kohls, PO Box 3115, Milwaukee, WI 53201-3115
544438593	ComenityCapital-DiamondsIntl, PO Box 182120, Columbus, OH 43218-2120
544438540	+ DIVERSE FUNDING, 3580 HARLEM RD SUITE 6, CHEEKTOWAGA, NY 14215-2045
544438595	DMI-First Savings Bank, DMI Respa Notice of Error, Lake Zurich, IL 60047-8945
544438607	+ DNF Associates, 2351 N Forest Road Suite 110, Getzville, NY 14068-9902
544438531	+ Detroit Water, 735 Randolph St, Detroit, MI 48226-2830
544438518	+ Dillon McCandless King Coulter and Graham, LLP, 128 West Cunningham Street, Butler, PA 16001-5742
544438597	George B. Smythe, 4000S. Faber Place Drive, Suite 300, Charleston, SC 29405
544438568	+ Georgia Traffic, PO Box 80447, Conyers, GA 30013-8047
544438618	+ Go Store It, 1249 Avondale Rd, Hendersonville, TN 37075-9672
544438514	+ Hilton Head Resort, 663 William Hilton Parkway, Hilton Head Island, SC 29928-3508
544438575	+ Hon Marvin H. Dukes, III, Beaufort County Master In Equity, 102 Ribaut Road 2nd Floor, Beaufort, SC 29902-4453
544438596	+ Honorable Nicola Henry-Taylor, Alleghany Court of Common Pleas, 712 City-County Building, 414 Grant St, Pittsburgh, PA 15219-2409
544438564	Huntington National Bank, Attn Credit Bureau Disputes, Columbus, OH 43216
544438604	+ Jannie M. Mutterer, Esq, PO Box 29, Bluffton, SC 29910-0029
544438513	+ Jones, Simpson and Newton, P.A., 7 Plantation Park Drive, Suite 3, Bluffton, SC 29910-6035
544438515	+ Louis Ard, 21215 Dartmouth, Southfield, MI 48076-5634
544438594	Nationstar Mortgage, PO Box 199111, Dallas, TX 75219-9111
544438537	+ Nationwide Credit Inc, 1225 Washington St Ste 301, Tempe, AZ 85288-1239
544438556	+ Ohio Turnpike EZ Pass, PO Box 94672, Cleveland, OH 44101-4672
544438554	+ PLYMOUTH ROCK ASSURANCE C, 695 ATLANTIC AVE, BOSTON, MA 02111-2605
544438549	+ PNC Bank, 1900 E 9th St, Cleveland, OH 44114-3484
544438585	+ PROGRESSIVEINSURANCE, 30440 LAKELAND BLVD, WICKLIFFE OH 44092-1749
544438543	+ Penn Power, 1080 Hanover St, Sugar Notch, PA 18706-2000
544438541	+ Peoples Gas, 1201 Pitt Street, Wilkinsburg, PA 15221-2098
544438614	+ Pioneer Fort Care, 518 MYOMA Rd Ste 301, Mars, PA 16046-2300
544438542	+ Pittsburgh Water and Sewer, 1200 Penn Ave, Pittsburgh, PA 15222-4216
544438526	+ SYNC'S YOUR CREDIT SCORE, PO BOX 71757, PHILADELPHIA, PA 19176-1757
544438603	+ Scott M. Wild, Attorney for the Plaintiff, PO Box 6867, Hilton Head Island, SC 29938-6867
544438528	+ TBOM ATLS FORTIVA, 6 CONCOURSE PARKWAY, 2ND FLOOR MAILROOM, ATLANTA, GA 30328-6117
544438517	++ THE HERTZ CORPORATION, 8501 WILLIAMS ROAD, ESTERO FL 33928-3325 address filed with court, Hertz Rental Car, 8501 Williams Road, 3rd Floor, Estero, FL 33928



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544438589 + Taybron Law Firm LLC, 3399 Churchview Ave, Pittsburg, PA 15227-4358  
544438588 + The Spa at Port Royal Sound, Care of IMC Resort Services, Inc AAMC, 239 Beach City Road, Hilton Head Island, SC 29926-4707  
544438545 + Ticket Division, PA Turnpike EZ Pass, 300 East Park Dr, Harrisburg, PA 17111-2729  
544438567 + Traffic Bluffton Magistrate, 4819 Bluffton Parkway, Bluffton, SC 29910-4622  
544438613 + UPMC Health Plan, 301 S. Hills Village, Pittsburg, PA 15241-1400  
544438558 + West Virginia Traffic Division, 300 Spruce St, Morgantown, WV 26505-5548  
544438557 + West Virginia EZ Pass, PO Box 1469, Charleston, WV 25325-1469  
544438599 + West-Aircomm FCU, 485 Buffalo St, Beaver, PA 15009-2058

TOTAL: 50

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email Text and Email PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
tr	Email Text: nobles@charleston13.com	Oct 04 2024 20:50:00	James M. Wyman, PO Box 997, Mount Pleasant, SC 29465-0997
ust	+ Email Text: ustpreion04.co.ecf@usdoj.gov	Oct 04 2024 20:50:00	US Trustee's Office, Strom Thurmond Federal Building, 1835 Assembly Street, Suite 953, Columbia, SC 29201-2448
544438566	Email PDF: bncnotices@becket-lee.com	Oct 04 2024 21:00:02	American Express, PO Box 981537, El Paso, TX 79998-1537
544438520	+ Email PDF: bncnotices@becket-lee.com	Oct 04 2024 21:00:21	American Express, 200 Vesey St, New York, NY 10285-0002
544438523	+ Email PDF: bncnotices@becket-lee.com	Oct 04 2024 21:00:16	American Express 2, PO Box 981537, El Paso, TX 79998-1537
544438560	+ EDI: BANKAMER	Oct 05 2024 01:03:00	BANK OF AMERICA, PO BOX 982238, EL PASO TX 79998-2238
544438592	EDI: BANKAMER	Oct 05 2024 01:03:00	BANK OF AMERICA, 4060 OGLETOWN/STANTON RD, NEWARK, DE 19713
544438583	+ EDI: BANKAMER	Oct 05 2024 01:03:00	BK OF AMER, PO BOX 982238, EL PASO TX 79998-2238
544438580	EDI: TSYS2	Oct 05 2024 01:04:00	Barclays Bank Delaware, PO Box 8803, Wilmington, DE 19899-8803
544438574	EDI: TSYS2	Oct 05 2024 01:04:00	Barclays Bank Delaware, 125 S West St, Wilmington, DE 19801-5014
544438553	+ Email Text: cms-bk@cms-collect.com	Oct 04 2024 20:50:00	CAPITAL MANAGEMENT SVCS, 698 S OGDEN ST, BUFFALO, NY 14206-2317
544438561	+ EDI: CCS COM	Oct 05 2024 01:04:00	CREDIT CONTROL SERVICES INC, 725 CANTON ST, NORWOOD MA 02062-2609
544438591	+ Email PDF: creditonebknotifications@resurgent.com	Oct 04 2024 21:00:01	CREDIT ONE BANK, 6801 S. CIMARRON ROAD, LAS VEGAS, NV 89113-2273
544438562	+ Email PDF: creditonebknotifications@resurgent.com	Oct 04 2024 21:00:16	CREDIT ONE BANK, PO BOX 98875, LAS VEGAS NV 89193-8875
544438533	+ Email Text: bankruptcies@crownsasset.com	Oct 04 2024 20:50:00	CROWN ASSET MGMT, 3100 BRECKINRIDGE BLVD STE 725, DULUTH, GA 30096-7605
544438509	+ Email Text: bankruptcy@cavps.com	Oct 04 2024 20:50:00	Calvary Portfolio Services, 500 Summit Lake, Suite 400, Valhalla, NY 10595-2321
544438605	+ Email Text: bankruptcy.notifications@fisglobal.com	Oct 04 2024 20:50:00	Chex Systems Inc., 7805 Hudson Road, Suite 100, Woodbury, MN 55125-1595
544438573	EDI: WFNNB.COM	Oct 05 2024 01:04:00	Comenity Bank-Caesars Rewards, PO Box 182789, Columbus, OH 43218-2789
544438535	+ EDI: WFNNB.COM	Oct 05 2024 01:04:00	Comenity Servicing LLC, PO Box 182789,



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Case Number	EDI/Email Text	Date/Time	Company/Address
544438551	+ EDI: WFNNB.COM	Oct 05 2024 01:04:00	Columbus, OH 43218-2789
544438582	EDI: WFNNB.COM	Oct 05 2024 01:04:00	ComenityCB-ZalesOutlet, PO Box 182120, Columbus, OH 43218-2120
544438530	+ Email Text: bankruptcy_notices@cmsenergy.com	Oct 04 2024 20:50:00	ComenityCapital-ZalesOut, PO Box 182120, Columbus, OH 43218-2120
544438602	EDI: CCS.COM	Oct 05 2024 01:04:00	Consumers Energy, One Energy Plaza, Jackson, MI 49201-2357
544438569	+ Email Text: ElectronicBkyDocs@nelnet.studentaid.gov	Oct 04 2024 20:50:00	Credit Collections, 725 Canton St, Norwood, MA 02062-2679
544438529	+ EDI: DTEE.COM	Oct 05 2024 01:04:00	DEPT OF EDUCATION NELNET, PO BOX 82561, LINCOLN NE 68501-2561
544438510	+ EDI: DISH	Oct 05 2024 01:03:00	DTE Energy, One Energy Plaza, Detroit Michigan 48226-1221
544438516	+ Email Text: bankruptcynotifications@ehi.com	Oct 05 2024 01:03:00	Dish Network LLC, 9601 S. Meridian Blvd, Englewood, CO 80112-5905
544438534	+ Email Text: data_processing@fin-rec.com	Oct 04 2024 20:50:00	Enterprise Rental Car, 600 Corporate Park Drive, St. Louis, Missouri 63105-4211
544438538	+ Email Text: crdept@na.firstsource.com	Oct 04 2024 20:50:00	FINANCIAL REC SERVICES, PO BOX 385908, MINNEAPOLIS, MN 55438-5908
544438600	Email Text: Atlanticus@ebn.phinsolutions.com	Oct 04 2024 20:50:00	FIRSTSOURCE ADVANTAGE LLC, 205 BRYANT WOODS SOUTH, AMHERST, NY 14228-3609
544438598	Email Text: bankruptcy@greenskycredit.com	Oct 04 2024 20:50:00	Fortiva, PO Box 105555, Atlanta, GA 30348-5555
544438617	+ Email Text: bankruptcy_notices@htc.hargray.com	Oct 04 2024 20:50:00	Greensky Financial, 1797 NE Expressway, Atlanta, GA 30329-7803
544438612	+ Email Text: bankruptcy@huntington.com	Oct 04 2024 20:50:00	Hargray, 856 William Hilton Parkway, Hilton Head Island, SC 29928-3423
544438525	EDI: JPMORGANCHASE	Oct 04 2024 20:50:00	Huntington National Bank, 41 South High St HC0320, Columbus, OH 43215-3406
544438565	EDI: JPMORGANCHASE	Oct 05 2024 01:03:00	JPMCB Card, PO Box 15298, Wilmington, DE 19850
544438581	Email Text: PBNCNotifications@peritussservices.com	Oct 05 2024 01:03:00	JPMCB Card Services, PO Box 15369, Wilmington, DE 19850-5369
544438536	+ Email Text: PBNCNotifications@peritussservices.com	Oct 04 2024 20:50:00	Kohls-Capital One, PO Box 3115, Milwaukee, WI 53201-3115
544438539	+ Email Text: bankruptcydpt@memcg.com	Oct 04 2024 20:50:00	Kohls-Chase, PO Box 3115, Milwaukee, WI 53201-3115
544438546	Email Text: usacompliance@monevo.com	Oct 04 2024 20:50:00	MIDLAND CREDIT MANAGEMENT, 320 EAST BIG BEAVER, SUITE 300, TROY, MI 48083-1271
544438570	Email Text: bankruptcy@nationalcreditsystems.com	Oct 04 2024 20:50:00	MONEVO INC, 8910 UNIVERSITY CNTR LANE, SUITE 400, SAN DIEGO, CA 92122
544438547	MEBN	Oct 04 2024 20:49:46	NATIONAL CREDIT SYSTEMS, PO BOX 672288, MARIETTA GA 30006
544438532	+ EDI: PRA.COM	Oct 04 2024 20:49:46	NORTHSTAR LOCATION SERVIC, 4285 GENESEE STREET, CHEEKTOWAGA, NY 14225-1943
544438550	+ EDI: PRA.COM	Oct 05 2024 01:04:00	PORTFOLIO RECOVERY ASSO, 140 CORPORATE BLVD, NORFOLK, VA 23502-4952
		Oct 05 2024 01:04:00	Portfolio Recov Assoc, 120 Corporate Blvd Ste

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			100, Norfolk, VA 23502-4952
544438586	+ Email Text: ebnteam@sscu.net	Oct 04 2024 20:50:00	SEVEN SEVENTEEN CREDIT UNION, 3181 LARCHMONT AVE, WARREN, OH 44483-2498
544438571	+ EDI: SYNC	Oct 05 2024 01:03:00	SYNCB LA-Z-BOY, P.O. BOX 965036, Orlando FL 32896-5036
544438577	+ EDI: SYNC	Oct 05 2024 01:03:00	SYNCB PPC, PO BOX 530975,, ORLANDO FL 32896-0001
544438608	EDI: SYNC	Oct 05 2024 01:03:00	SYNCB-Sams Club Dual Card, PO Box 965005, Orlando, FL 32896-5005
544438611	EDI: SYNC	Oct 05 2024 01:03:00	SYNCB-Scorer Rewards, PO Box 965005, Orlando, FL 32896-5005
544438616	+ Email Text: dl-csgbankruptcy@charter.com	Oct 04 2024 20:50:00	Spectrum, 890 William Hilton Parkway, HHI, SC 29928-3418
544438579	+ EDI: SYNC	Oct 05 2024 01:03:00	Syncb Lowes, PO Box 96500, ORLANDO FL 32896-0001
544438563	EDI: SYNC	Oct 05 2024 01:03:00	Syncb-Dicks, PO Box 71727, Philadelphia, PA 19176-1727
544438552	EDI: SYNC	Oct 05 2024 01:03:00	Syncb-Sam S Club DC, PO Box 71727, Philadelphia, PA 19176-1727
544438572	EDI: WTRRN BANK.COM	Oct 05 2024 01:04:00	TD Bank USA-Target Credit, PO Box 673, Minneapolis, MN 55440-0673
544438578	+ EDI: CITICORP	Oct 05 2024 01:03:00	THE HOMEDEPOT CITIBANK, PO BOX 6497, SIOUX FALLS, SD 57117-6497
544438615	+ EDI: VERIZONCOMB.COM	Oct 05 2024 01:04:00	Verizon, 1095 Avenue of the Americas, New York City, NY 10036-6704

TOTAL: 55

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
544438590		BARCLAYS BANK DELAWARE, 125 S WEST STREET BARCLAYS BANK, OLD NAVY
544438601		Verizon
544438609	*P	Barclays Bank Delaware, PO box 8803, Wilmington, DE 19899-8803

TOTAL: 2 Undeliverable, 1 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 06, 2024

Signature: /s/Gustava Winters

# **Exhibit B**





Jean Ard <jacquelineard25@gmail.com>

**Re: Estate at Westbury Owners Association, Inc. v. Jacqueline E. Ard et al.; Case No.: 2024-CP-07-01407 AUTOMATIC STAY CEASE ALL ADVERSE ACTIONS**

1 message

**Jacqueline Ard** <jacquelineard25@gmail.com>  
To: Nhi Nguyen <nhi@bromleylawfirm.com>  
Cc: Evan Bromley <evan@bromleylawfirm.com>

Fri, Oct 4, 2024 at 5:01 PM

Sent from my iPhone

On Oct 3, 2024, at 4:13 PM, Nhi Nguyen <nhi@bromleylawfirm.com> wrote:

Dear Ms. Ard,

Attached, please find a Notice of Hearing regarding the above-captioned case.

Kind regards,

Nhi Nguyen  
*Legal Assistant*

Bromley Law Firm LLC  
211 Goethe Road, Suite B  
P.O. Box 570 (Mail)  
Bluffton, South Carolina 29910  
T: 843-868-2801  
F: 843-868-2802  
[nhi@bromleylawfirm.com](mailto:nhi@bromleylawfirm.com)  
[www.bromleylawfirm.com](http://www.bromleylawfirm.com)

<image001.png>

DEBT COLLECTION: This firm collects debts for mortgage lenders and other creditors. Any information obtained will be used for that purpose. However, if you have previously received a discharge in bankruptcy, this message is not and should not be construed as an attempt to collect a debt, but only as an attempt to enforce a lien.

PRIVILEGED AND CONFIDENTIAL: This communication may contain privileged or other confidential information and its disclosure is strictly limited to the recipient intended by the sender of this message. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. You may not rely on any legal conclusions or opinions expressed in this communication. No duties are assumed, intended or created by this communication. No attorney-client relationship exists unless a formal written agreement has been entered into between this law firm and the recipient of this email.

<20241003\_NN\_Ltr to Jacqueline E. Ard\_Notice of Hearing.pdf>

United States Bankruptcy Court  
District of South Carolina

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 13 of the United States Bankruptcy Code, entered on 10/04/2024 at 2:53 PM and filed on 10/04/2024.

**Jacqueline Elizabeth Ard**

239 Beach City Rd  
Unit 3218  
Hilton Head, SC 29926  
313-770-7051  
SSN / ITIN: xxx-xx-3748  
Tax ID / EIN: 61-1604111, 45-4003120

**Terry Frank Nicola**

663 William Hilton Pky  
Unit 4408  
Hilton Head, SC 29928  
724-494-6884  
SSN / ITIN: xxx-xx-8286  
Tax ID / EIN: 88-1009431

The bankruptcy trustee is:

**James M. Wyman**

PO Box 997  
Mount Pleasant, SC 29465-0997  
(843) 388-9844

The case was assigned case number 24-03611-eg to Judge Elisabetta G.M. Gasparini.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.scb.uscourts.gov> or at the Clerk's Office, J. Bratton Davis United States, Bankruptcy Courthouse, 1100 Laurel Street, Columbia, SC 29201-2423.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Lauren T Maxwell**  
**Clerk, United States**  
**Bankruptcy Court**



# **Exhibit C**



STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

ESTATE AT WESTBURY OWNERS  
ASSOCIATION, INC.,

Plaintiff,

v.

JACQUELINE E. ARD, HILTON  
HEAD RESORT FOUR SEASONS  
CENTRE HORIZONTAL PROPERTY  
REGIME COUNCIL OF CO-OWNERS,  
INC., and BEAUFORT COUNTY,  
SOUTH CAROLINA, a political  
subdivision of the State of South  
Carolina.

Defendants.

IN THE COURT OF COMMON PLEAS  
FOURTEENTH JUDICIAL CIRCUIT  
Civil Action No.: 2024CP0701407

**NOTICE OF HEARING**

**TO: ALL DEFENDANTS**

**PLEASE TAKE NOTICE** that an Entry of Default Damages and Assessment Lien Foreclosure Hearing will be held before Special Referee Benjamin C.P. Sapp, Esq., on October 16, 2024, beginning at 1:30PM, via Zoom:

<https://us04web.zoom.us/j/71875423976?pwd=sgDV8lmtwqKs3lxOUmb1zjpd2GBFWH.1>

Meeting ID: 718 7542 3976

Passcode: 7JR4mm

You are invited to attend and participate as allowed by law.

[Signature page to follow]

# **Exhibit D**



Jean Ard <jacquelineard25@gmail.com>

**RE: Estate at Westbury Owners Association, Inc. v. Jacqueline E. Ard et al.; Case No.: 2024-CP-07-01407 AUTOMATIC STAY CEASE ALL ADVERSE ACTIONS**

1 message

**Evan Bromley** <evan@bromleylawfirm.com>

Mon, Oct 7, 2024 at 3:19 PM

To: Jacqueline Ard <jacquelineard25@gmail.com>, Nhi Nguyen <nhi@bromleylawfirm.com>

Ms. Ard,

Acknowledging receipt of this Notice of Bankruptcy filing. We have informed the special referee of the notice and removed the foreclosure hearing from the 10/16 calendar.

Regards,

Evan K. Bromley  
Attorney

**Bromley Law Firm LLC**  
211 Goethe Road, Suite B  
P.O. Box 570 (Mail)  
Bluffton, South Carolina 29910  
T: (843) 868-2801  
F: (843) 868-2802  
[evan@bromleylawfirm.com](mailto:evan@bromleylawfirm.com)  
[www.bromleylawfirm.com](http://www.bromleylawfirm.com)



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**From:** Jacqueline Ard <jacquelineard25@gmail.com>

**Sent:** Friday, October 4, 2024 5:01 PM

**To:** Nhi Nguyen <nhi@bromleylawfirm.com>

**Cc:** Evan Bromley <evan@bromleylawfirm.com>

**Subject:** Re: Estate at Westbury Owners Association, Inc. v. Jacqueline E. Ard et al.; Case No.: 2024-CP-07-01407  
AUTOMATIC STAY CEASE ALL ADVERSE ACTIONS



# **Exhibit E**

From: Estate at Westbury [secretaryeaw@gmail.com](mailto:secretaryeaw@gmail.com)

Subject: Meeting Agenda

Date: Oct 8, 2024 at 5:56:48 AM

To: EAW HOA Administrator

[eawhoaoffice@gmail.com](mailto:eawhoaoffice@gmail.com), EAW HOA

[eawhoaboard@gmail.com](mailto:eawhoaboard@gmail.com), yuritzi garcia

[eawhoateam@gmail.com](mailto:eawhoateam@gmail.com)

Bcc: [jacquelineard25@gmail.com](mailto:jacquelineard25@gmail.com)

pdf

**EAW Agenda 10.10.24.pdf**

149 KB

**Estate at Westbury Homeowner's Association  
Board of Directors Meeting Agenda  
October 10, 2024, 6:00 PM**

**Please note Board Meetings are open to Owners of Record at the  
Beaufort County Register of Deeds ONLY**

**Board's "Code of Conduct" will be adhered to.**

- A. Call to Order, Roll Call, and verification of quorum - Matt
  
- B. Secretary's Report – Ralph
  - a. Motion made to approve August 8, 2024, minutes.
  - b. No meeting was held in September therefore there are no minutes for September 2024
    - i. Per our attorney, revoking the parking decals associated with the foreclosure of (ARD) 1106. All board members are in agreement and this action is already stated in the EAW rules & regulations.
    - ii. All 5 board members have unanimously agreed to revoke the parking decals associated with unit 1106.
  - c. On October 4, 2024, the Board meet with our Attorney to review several legal issues most of which were left over from Cedar Management and the previous Board.
  
- C. Treasurer's report – John
  
- D. Presidents Report – Matt
  - a. Westbury Suit update
  
- E. Vice President Report – Janet
  
- F. Member at Large Report – Debra
  - a. Committee Report(s) / updates
  
- G. Collections Report
  
- H. Old Business
  
- I. New Business
  - a. Process to check on keys
  - b. Pet Fee clarification
  
- J. Adjournment



**Topic: Estate at Westbury Board Meeting**

**Time: Oct 10, 2024 06:00 PM Eastern Time (US and Canada)**

**Join Zoom Meeting**

**<https://us02web.zoom.us/j/86300632338?pwd=xanQ5cZyq53nWFbUXMfh1pM157ISEW.1>**

**Meeting ID: 863 0063 2338**

**Passcode: 627634**

**Dial by your location**

- +1 301 715 8592 US (Washington DC)
- +1 305 224 1968 US
- +1 312 626 6799 US (Chicago)
- +1 646 558 8656 US (New York)

# **Exhibit F**



Jacqueline Ard <jacquelineard72@gmail.com>

## Return my vehicle IMMEDIATELY!

1 message

Jacqueline Ard <jacquelineard72@gmail.com>

Mon, Nov 11, 2024 at 11:27 AM

To: Administrator EAW HOA <eawhoaoffice@gmail.com>, eawhoateam@gmail.com, secretaryeaw@gmail.com, eawmematlarge.24@gmail.com, eawhoajcs@gmail.com, eawhoafinance@gmail.com, eawhoaboard@gmail.com

Good Morning Members of the Board:

First, As you all are well aware, I recently filed a Chapter 13 Bankruptcy in the District of South Carolina. Case #24-03611-JD.

When you file a Bankruptcy there are provisions that immediately go into effect. These provisions provide immediate relief from creditors demanding any payment, collecting any outstanding balance, or taking any adverse action towards you to recover property to satisfy your debt. It is a violation for ANY creditor to take any type of action towards me.

You have violated my rights by:

1. Sending me notices to demand payment
2. Publicly announcing to all the members of the Association that you have foreclosed on my unit and deactivated all of my parking decals and pass privileges.
3. Revoking my parking privileges and remove my parking pass from the system
4. Confiscating my vehicle and removing it from the property.

The Board DOES NOT have the authority or right to remove my vehicle from the premises. Nor can they deactivate my parking decals. My vehicle is an essential part of operating my business and transporting my disabled husband. You have imposed an extreme hardship on me and my husband, and you have 24 hours to rectify this situation before I take further action. The Board wrongfully communicated my delinquency to all the members of the Association, attesting that the decision to violate my rights was a unanimous decision made by the Board, therefore, if it's not rectified IMMEDIATELY each Board Member will be personally liable for these actions.

I demand that you return my vehicle to me immediately! Refrain from any/all collection calls, emails, letters or other harassing and oppressive actions towards me and my husband.

Secondly, I am requesting the production of important documents. I need a detailed history of my account. The document must provide a complete history of all payments and charges made to my account from March 2021 to present. I also need a detailed list of all common expenses paid by the Association on a monthly, quarterly, and annual basis. The list must include the payee, the description and the amount paid. The deadline to produce and deliver this information is Tuesday November 12, 2024 12:00p.

Let this notice be your final warning to cure all violations, stop any/all adverse actions to collect the outstanding balance, and produce ALL documents that I have requested. If you have any questions or concerns you can email me at [jacquelineard72@gmail.com](mailto:jacquelineard72@gmail.com)

Regards,

Jacqueline Ard



# Exhibit G









# Exhibit H

# ESTATE AT WESTBURY OWNERS ASSOCIATION, INC.

## Corporate Information

Entity Id [00414679](#)  
Entity Type [Nonprofit](#)  
Status [Good Standing](#)  
Domestic/Foreign [Domestic](#)  
Incorporated State [South Carolina](#)

## Important Dates

Effective Date [10/14/2005](#)  
Expiration Date [N/A](#)  
Term End Date [N/A](#)  
Dissolved Date [N/A](#)

## Registered Agent

Agent [Julie A. Franklin](#)  
Address [25 Thurmond Way, #2976](#)  
[Bluffton, South Carolina 29910](#)

[Request Documents](#)

[Add Filing](#)

## Official Documents On File

Filing Type	Filing Date
Notice of Change of Registered Office or Registered Agent or Both of a Nonprofit Corporation	11/14/2024
Notice of Change of Registered Office or Registered Agent or Both of a Nonprofit Corporation	06/27/2024
Notice of Change of Registered Office or Registered Agent or Both of a Nonprofit Corporation	07/08/2022
Notice of Change of Registered Office or Registered Agent or Both of a Nonprofit Corporation	02/15/2019
Change of Agent or Office	07/18/2016
Change of Agent or Office	06/06/2014
Change of Agent or Office	10/24/2012
Change of Agent or Office	12/06/2007
Amendment	12/13/2005
Incorporation	10/14/2005

## Former Names

Name	Filing Date
WESTBURY PARK OWNERS ASSOCIATION, INC.	10/21/2005





Jacqueline Ard <jacquelineard72@gmail.com>

## EAW Address Confirmation

1 message

**Julie A. Franklin** <julie@franklinlegalservices.com>

Thu, Nov 14, 2024 at 3:59 PM

To: jacquelineard72@gmail.com, Evan Bromley <evan@bromleylawfirm.com>

Ms. Ard,

Per our telephone conversation this afternoon, please be advised that the notice address for EAW is as follows:

Estate at Westbury Owners Association, Inc.  
C/O Registered Agent, Julie A. Franklin  
[25 Thurmond Way, #2976](#)  
[Bluffton, SC 29910](#)

Please include that address on your filings with the court, and feel free to include my email and Attorney Bromley's on your documents if you would like.

Upon receipt of your schedules filed, Attorney Bromley will review them and will be predominantly handling this matter on EAW's behalf in your case with the bankruptcy court, but again, I do not mind if you wish to include me as a contact for EAW in the case as well.

Best,

J

--

**Julie A. Franklin, Esq.**  
Franklin Legal Services, LLC  
DBA Law Office of Julie A. Franklin  
[100 Bull Street, Ste. 200](#)  
[Savannah, GA 31401](#)  
T: (706) 452-1303  
F: (706) 522-9207  
[www.franklinlegalservices.com](http://www.franklinlegalservices.com)

### STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and contain confidential and/or privileged information intended for that purpose. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. If you are not the intended recipient, please immediately notify the sender by reply email or by calling (706) 452-1303 and delete this message and its attachments, if any. Thank you for your cooperation.

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

In re

JACQUELINE ELIZABETH ARD and  
TERRY FRANK NICOLA

Debtors

CASE NO.: 24-03611-JD  
CHAPTER 13

**CERTIFICATE OF SERVICE**

I, Jacqueline Ard, do hereby certify that I have this day served a certified true copy of the:

- Debtors Motion for Additional Damages Based Contempt and Willful Violation of the Automatic Stay
- Exhibit List

delivered on January 27, 2025, by First-class mail postage paid and by means of electronic delivery via the CM/ECF Electronic Messaging System and Email to the persons listed below.

**Date: January 27, 2025**



**JACQUELINE E ARD *PRO SE* DEBTOR**  
239 BEACH CITY RD #3218  
HILTON HEAD ISL, SC 29926  
jacquelineard72@gmail.com

**PERSONS SERVED:**

(Served via CM/ECF)

**US Trustee's Office**

Strom Thurmond Fd Bldg

835 Assembly St ste 953

Columbia, SC 29201

[USTPRegion04.CO.ECF@usdoj.gov](mailto:USTPRegion04.CO.ECF@usdoj.gov)

**James M. Wyman**  
Chapter 13 Trustee  
P.O. Box 997  
Mt. Pleasant, SC 29465-0997  
[13info@charleston13.com](mailto:13info@charleston13.com)

**VIA US First Class postage prepaid mail**

SEE ATTACHED LIST

**Bromley Law Firm LLC**  
**Evan K. Bromley**  
211 Goethe Road, Suite B  
Bluffton, SC 29910

**Julie A. Franklin**  
P.O.Box 2976  
Bluffton, SC 29910

**Debra Schumann**  
100 Kensington Blvd Apt No.107  
Bluffton, SC 29910-7464  
19125-4033

**Matthew Paul**  
2546 Salmon Street  
Philadelphia, PA

**Estate at Westbury Owners Assoc, Inc**  
**Board of Directors**  
85 Kensington Blvd  
Bluffton, SC 29910-4884

**Janet Spinelli**  
100 Kensington Blvd Apt No.918  
Bluffton, SC 29910-7481

**John Curtis**  
100 Kensington Blvd Apt No.1603  
Bluffton, SC 29910-7464

**Palmetto Towing and Recovery**  
38 Sugar Maple Street  
Bluffton, SC 29910-7678

**Ralph Paine**  
151 Lake Linden Drive  
Bluffton, SC 29910-6426